

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

LUIS CABRERA
a/k/a Luis Alcantara
a/k/a Luis Cabreia
a/k/a Hector Rivera
a/k/a Hector Rivers

CRIMINAL NO.: 04-10159-NG

JOINT MOTION FOR CONTINUANCE OF STATUS CONFERENCE
AND TO EXCLUDE TIME

The United States, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant United States Attorney Seth P. Berman, and the defendant, by and through his attorney Carl Donaldson, Esq., jointly move to continue the Detention Hearing and Status Conference currently scheduled for March 18, 2005 at 2:00 p.m until the afternoon of April 4, 2005 at 3:30 p.m. As grounds therefore, the parties state that on the scheduled date the attorney for the government will be out of the country, and on subsequent dates the attorney for the defendant will be out of the country.

Additionally, the parties move, pursuant to 18 U.S.C. §3161 (h)(8)(A), to exclude the period of time commencing on March 18, 2005 and ending on April 7, 2005. As grounds therefor, the parties state that the interests of justice are best served by allowing both attorneys to be present on the next scheduled date.

WHEREFORE, the parties respectfully request, under 18 U.S.C. §3161(h)(8)(A) and §5(c)(1)(A) of Plan for Prompt Disposition of Criminal Cases of this Court, that this Court find, based on the above, that the ends of justice served by granting the requested continuance and exclusion outweigh the best interest of the public and the defendant in a speedy trial, and, accordingly, grant the continuance as requested above and exclude the above period in computing the time within which trial must commence under 18 U.S.C. §3161.

Respectfully Submitted,

LUIS CABRERA
By his attorney

MICHAEL J. SULLIVAN
United States Attorney
By:

/s/Carl Donaldson
CARL DONALDSON, ESQ.
617-742-0474

/s/ Seth P. Berman
SETH P. BERMAN
Assistant U.S. Attorney
(617) 748-3385

March 11, 2005